

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MUNA AL-SUYID, individually and on behalf of the estates of her family members ABDEL SALAM AL-SUYID, IBRAHIM AL-SUYID, KHALID AL-SUYID and MUSTAFA AL-SUYID, and ABDALLA AL-KRSHINY, AHMAD AL-KRSHINY, MAHMUD AL-KRSHINY, and IBRAHIM AL-KRSHINY, individually and on behalf of his family member ALI AL-KRSHINY and MUSTAFA AL-KRSHINY,

Plaintiffs,

V.

KHALIFA HIFTER, KHALID HIFTER, and SADDAM
HIFTER

Defendants.

Civil Action No.
1:20-cv-00170-LMB-JFA

JURY TRIAL DEMANDED

MAY 22, 2020

**PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT PRUSUANT TO FED. R. CIV. P
55(B)**

COMES NOW Plaintiff Muna al-Suyid (individually and on behalf of the estates of her father Abdel Salam al-Suyid, and her brothers Ibrahim al-Suyid, Khalid al-Suyid, and Mustafa al-Suyid), Plaintiffs Abdalla al-Krshiny, Ahmad al-Krshiny, Mahmud al-Krshiny, and Plaintiff Ibrahim al-Krshiny (individually and on behalf of the estates of his brothers Ali al-Krshiny and Mustafa al-Krshiny) (collectively Plaintiffs) and respectfully request this Court enter a Default Judgment against Defendant Khalifa Hifter, Defendant Khalid Hifter, and Defendant Saddam Hifter (collectively Defendants) in this matter.

Based on the included Memorandum in Support Plaintiffs ask this Court to enter a Default Judgment for failure to respond. Defendants were served on March 14, 2020, to Fed. R. Civ. P. 4(e)(1) and Va. Code § 8.01-296(2)(b) by a private process server through post and mail as shown in the Affidavits of Service [ECF Doc. Nos. 20, 21, 22]. Thus, Defendants had until April 6, 2020, to file a responsive pleading. Defendants have not done so to date. Plaintiffs therefore request this Court enter a Default Judgment against Defendants in an amount equal to \$10 million for each decedent and \$5 million for each survivor.

Respectfully Submitted,

Dated: May 22, 2020

Kevin T. Carroll (VSB#95292)
Wiggin and Dana LLP
800 17th Street, NW, Suite 520
Washington, DC 20006
kcarroll@wiggin.com
Phone: 202-800-2475
Facsimile: 212-551-2888